

1 CHRIS T. RASMUSSEN, ESQ.
2 Nevada Bar No. 007149
RASMUSSEN & KANG
3 330 South Third Street, Suite 1010
Las Vegas, Nevada 89101
(702) 464-6007
(702)464-6009 fax
4 Attorney for Defendant

5 **UNITED STATES DISTRICT COURT**

6 **DISTRICT OF NEVADA**

7 UNITED STATES OF AMERICA,)
8 Plaintiff,)
9 vs.)
10 TERESA BUSTAMONTE,)
11 Defendant.)
12
13

) 2:14-cr-0102-JAD-VCF

)
10 **STIPULATION TO CONTINUE**
SENTENCING

14 IT IS HEREBY STIPULATED AND AGREED by and between defendant, TERESA
15 BUSTAMONTE, by and through her counsel, CHRIS T. RASMUSSEN, ESQ., and the United
16 States America, by its counsel, NICHOLAS DICKENSON Assistant U.S. Attorney, that the
17 above-captioned matter currently scheduled for November 16, 2015 at 10:00 a.m. be vacated and
18 continued until for at least 90 days or a time convenient to the court.

19 This Stipulation is entered into for the following reasons:

- 20 1. The Government and Defendant are still in negotiations;
- 21 2. Counsel for the Defendant has spoken to the Defendant and the Defendant has no
objection to this continuance;
- 22 3. Denial of this request for continuance of the parties deadline for the filing of pre-trial
motions and responsive pleadings would deny the parties herein sufficient time within which to
be able to effectively and thoroughly research, prepare and submit for filing appropriate pre-trial
motions and notices of defense, taking into account the exercise of due diligence.
- 23 4. Additionally, denial of this request for a continuance could result in a miscarriage of

1 justice.

2 6. This is the third request for continuance of sentencing .

3 DATED this 4nd day of November, 2015.

4
5 /s/ Chris T. Rasmussen

6 CHRIS T. RASMUSSEN, ESQ.
Attorney for Defendant

/s/ NICHOLAS DICKENSON

NICHOLAS DICKENSON, ESQ.
Assistant U.S. Attorney

1 CHRIS T. RASMUSSEN, ESQ.
2 Nevada Bar No. 007149
3 330 South Third Street, Suite 1010
Las Vegas, Nevada 89101
(702) 464-6007
Attorney for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
ALBERT PLANELLS,
Defendant.

Case No.: 2:14-cr-00260-JAD-GWF

**FINDINGS OF FACT AND
CONCLUSIONS OF LAW**

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. The parties agree to a continuance;
 2. Counsel for the Defendant has spoken to the Defendant and the Defendant has no

objection to this continuance.

CONCLUSIONS OF LAW

1. Denial of this request for a continuance would result in a miscarriage of justice.
 2. For all the above- stated reasons, the ends of justice would best be served by a continuance of the sentencing date at least ninety days.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
TERESA BUSTAMONTE,
Defendant.

2:14-cr-0102-JAD-VCF

ORDER

ORDER

Accordingly, IT IS SO ORDERED that the sentencing currently scheduled for November 16, at the hour of 10:00 a.m., be vacated and continued to Tuesday, February 16, 2016, at 9:00 a.m. in Courtroom #6D.

Dated this 5th day of November, 2015.

UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28